

UNITED STATES DISTRICT COURT  
for the

Southern District of Texas

AUG 04 2016

Clerk of Court

United States of America )  
 Carlos PATINO Moreno )  
 YOB: 1983, Citizen: Mexico )  
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Case No. M-16-1471-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 29, 2016 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

8 U.S.C. 1324 (a)(1)(A)(v)(ii), (a)(1)(A)(v)(I), and (a)(1)(B)(i)      Knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered, and remained in the United States in violation of law, did knowingly and intentionally conspire and agree with other persons known and unknown, to transport and move said aliens within the United States in furtherance of such violation of law, that is, from a location near Donna, Texas to a location near San Manuel, Texas, by motor vehicle.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

*OK to file. TAT*

*Fatima Alkhatib*  
Complainant's signature

Fatima Alkhatib, HSI Special Agent  
Printed name and title

Sworn to before me and signed in my presence.

Date: 8/4/2016

*Dena Palermo*  
Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Dena Palermo  
Printed name and title

Attachment "A"

On June 29, 2016, the Hidalgo County High Intensity Drug Trafficking Area (HIDTA) conducted surveillance on a tractor trailer which was suspected of transporting narcotics. After a vehicle stop near San Manuel, Texas, officers found the tractor trailer to be transporting twenty five (25) undocumented aliens.

Border Patrol Agents (BPAs) briefly interviewed all twenty five subjects and they admitted to being illegally present in the United States without any proper documentation that would allow them to enter or remain in the United States under legal status.

The driver of the tractor trailer was later identified as Pablo Calderon-Moreira, a citizen of the United States.

On July 1, 2016, during a post-Miranda interview, Calderon stated that on June 29, 2016, he, along with other individuals, met with an individual, later identified as Carlos PATINO-Moreno, who was driving a white Ford pickup truck, at a convenience store. Calderon stated that he witnessed PATINO give Epifanio Acosta an envelope containing currency. Acosta identified PATINO to Calderon as "the big boss". PATINO then instructed Calderon and Acosta to hurry up and pick up the tractor trailer because the "pollitos" were ready to be moved and "time is money". Calderon understood the use of the word "pollitos" to refer to undocumented aliens. Shortly after the meeting, Calderon was driven to the location where the tractor trailer containing the aliens was parked. Agents have identified the location as a residence near Donna, Texas.

The meeting between PATINO and the other individuals was observed and photographed during surveillance conducted by HIDTA.

Research conducted on PATINO revealed that from 2014-2016 he received approximately \$20,000 in money transfers from numerous individuals located throughout the U.S. and Mexico. PATINO sent approximately \$3,100 via money transfers to several individuals located throughout the U.S. and Mexico. Both the amounts transmitted to and received by PATINO and the geographical origins of the payments commensurate with human smuggling fees.